

Nadira Plater

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2009 JAN 31 A 10:20

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Office of the General Counsel
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

**RE: MUR 6152 – ADDITIONAL INFORMATION FOR FORMAL COMPLAINT
AGAINST THE CHALDEAN CHAMBER OF COMMERCE PAC, AKA
“CHALDEANS FOR CONGRESSMAN JOE KNOLLENBERG,” FOR
VIOLATIONS OF FEDERAL ELECTION LAW**

Dear Federal Election Commission Official:

Thank you for your letter of December 31, 2008, informing me that you received my sworn complaint in the above referenced matter. I write today to provide you with additional information pertinent to this allegation.

As explained in my December 22, 2008 complaint, eighteen members of the Chaldean community mailed a letter entitled “Chaldeans for Congressman Joe Knollenberg” in apparent violation of federal election law. Many of these individuals are either officials or contributors to the Chaldean Chamber of Commerce Political Action Committee, a non-federal PAC, including Martin Manna, the PAC’s treasurer.

Martin Manna and Michael Sarafa—another individual who signed the Chaldeans for Congressman Joe Knollenberg letter—are also managers of a publication called the Chaldean News. See Attachment A. In honor of my Chaldean heritage, I subscribed to the Chaldean News in 2007 under my maiden name, Nadira Daiza, a name I have not used since my marriage 35 years ago. See Attachment B. The Chaldean News is the only mailing I have received in nearly four decades under my maiden name.

However, the Chaldeans for Knollenberg letter also was addressed to me using my maiden name. See Attachment C. Moreover, the Chaldean Chamber of Commerce Political Action Committee, the Chaldeans for Congressman Joe Knollenberg, and the Chaldean News all share the same mailing address. It therefore appears likely that Martin Manna and Michael Sarafa leveraged their positions of authority in these three organizations to obtain my maiden name and mailing address for the purposes of mailing the Chaldeans for Congressman Joe Knollenberg letter.

The Federal Election Committee has defined the terms “expenditure” and “contribution” to include “anything of value,” including “mailing lists.” See 11 C.F.R. § 100.51(d)(1),

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11 C.F.R. 100.111(e)(q); *see also* 2 U.S.C. §§ 431(8)&(9). To the extent the Chaldean News mailing list was provided to Chaldeans for Congressman Joe Knollenberg and/or the Chaldean Chamber of Commerce PAC as an in-kind or other contribution, the value of the mailing list must be incorporated into the expenditure limits specified at 2 U.S.C. § 431(a) for purposes of determining whether these entities have exceed the limits specified for registration as a political committee under federal election law.

Moreover, all campaign expenditures and contributions must be documented and reported to the Federal Election Committee. *See* 2 U.S.C. § 434(b). Yet none of the individuals or organizations involved with the Chaldeans for Congressman Joe Knollenberg mailing have disclosed any expenditures or contributions to the Federal Election Committee. By failing to disclose such contributions and expenditures as required by law, these individuals and entities appear to be in further violation of federal campaign finance laws and regulations.

Again, I reiterate that I applaud my fellow Chaldeans' efforts to engage our community in public debate. However, to ensure the integrity both of our community and the federal electoral process, I believe such attempts must follow both the spirit and the letter of the law. It is apparent that neither the spirit nor the letter of the law was followed in this instance. I request that the Federal Election Commission include in the on-going investigation numbered MUR-6152 the additional allegations made in this letter, levy any fines or other penalties as appropriate once these allegations are substantiated, and inform me of the results of the investigation.

Thank you,

Nadira Daiza Plater
Nadira (Daiza) Plater

NADIRA (DAIZA) PLATER SUBSCRIBED AND
SWORN TO BEFORE ME ON THIS DAY
of January 26, 2009

[Signature] 1/26/09
Notary Public, Missouri, Commission Expires
Asking in *St. Louis* County
My Commission Expires July 26, 2010

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With the winter air cozy in my home office watching the fall and of 10 inches of snow falling in Metro Detroit. It is one of those rare news days where several stories fight for the lead: the weather, the auto industry troubles loan package approved by President Bush, lawmakers okaying Cobo Hall bills and aiding light rail for Detroit.

As many of you know, I wear several hats in life — one being a co-founder and editor-in-chief of this publication and another being the press secretary to Wayne County Executive Robert Ficano. In that job, life is never dull. I am busy on this day that is supposed to be a day off. It is turning out to be as busy as it would be if I were still a reporter on WJR. Instead of seeking out the story for public consumption, I am being sought after by reporters to talk to my boss (Ficano) on every major story of the day.

For the purpose of this publication, the hat I wear in the Chaldean community is that of a writer and this issue the auto industry troubles is our lead, or as we say in the magazine business, our cover story.

The bridge loan is a step in the right direction. I am one of those people who believe the loan must happen because without it, the trickle-down effect would further devastate this already suffering economy.

In this issue, we focus on the trickle-down effect in our community. Businesses across this region are negatively

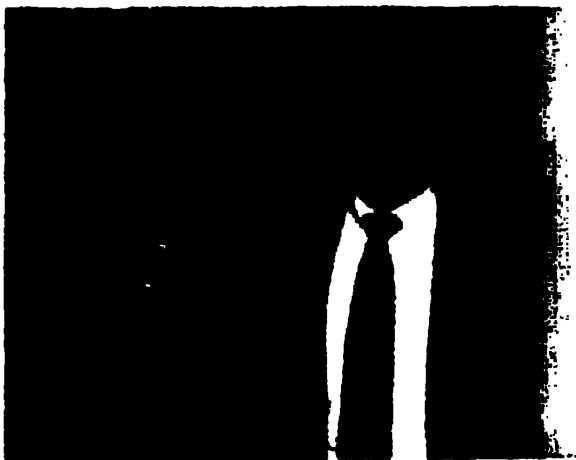


VANESSA
DASHA-GARINO
EDITOR IN CHIEF

affected by the economy as a whole including the retraction in the auto industry.

It is one of those times when the hats I wear become interchangeable and almost are sewn into one. I have done extensive research on the auto industry for my job as a press secretary and fully understand what Ficano has been saying for six years; this

is not a cyclical economy and downturn in a typical cycle but a true retraction in our major industry. We should have — years ago — diversified this region.



Vanessa Dasha-Garino with General James Marks, who hires translators to serve in Iraq. See article on page 27.

Instead, we find ourselves scrambling to figure out how this happened, fighting to stop the train wreck and searching for solutions. The stores located near auto plants may be forced to close their doors. The car dealers are reinventing themselves. The Realtors have found new careers. The mortgage lenders are trying to drown out

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EXHIBIT C

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